

No. 2021-06773

IN THE MATTER OF  
THE MARRIAGE OF  
DANIELLE L. FRIDGE  
and  
CHARLES L. FRIDGE, III and  
IN THE INTEREST OF C. L. F., IV,  
C. L. F. and C. L. F., CHILDREN  
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IN THE DISTRICT COURT  
HARRIS COUNTY, TEXAS  
245TH JUDICIAL DISTRICT

**DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS**

Custodian of Records for: **Harry Winston, Inc.**

Records Pertaining To: **See Attached Exhibit "A"**

Type of Records: **Any and all records and/or documents outlined in the attached "Exhibit A-Harry Winston, Inc." in the custodian's control, custody or possession**

1. Please state your full name and telephone number.

Name: Robert Scott

Phone Number: 212-315-7940

2. Please state by whom you are employed and the business address.

Employer: Harry Winston Inc.

Address: 717 5th Ave NY NY 10022

3. What is the title of your position or job?

Answer: Chief Financial Officer

4. Are you the custodian of records for this entity?

Answer: YES

5. Are these memoranda, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named entity, in your custody or subject to your control, supervision or direction?

Answer: YES

6. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: YES

7. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations, mentioned in Question No. 5. Have you complied? If not, why?

Answer: YES

8. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such memoranda, reports, records, or data compilations?

Answer: YES

9. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this facility?

Answer: YES

10. Was it in the regular course of business of this facility for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: YES

11. Were the entries on these records made at or shortly after the time of the transaction recorded?

Answer: YES

12. What is the retention period of these types of records?

Answer: 10 + YEARS

13. Was the method of preparation of these records trustworthy?

Answer: YES



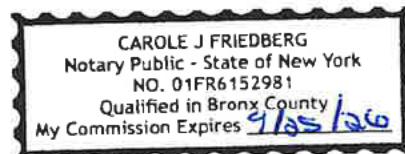
WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared Robert Scott, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this 19 day of January, 2024.

Carole J. Friedberg  
NOTARY PUBLIC

My Commission Expires: 9/25/26



Order No. 19265.016

EXHIBIT A

## Harry Winston, Inc.

January 19, 2024

Lilly & Van Ness, L.L.P.  
3355 W Alabama Street, Suite 600  
Houston, Texas 77098

RE: Danielle Fridge vs. Charles Fridge III

Dear Mr. Van Ness,

This letter is in response to the attached Subpoena regarding the matter of the marriage of Danielle L. Fridge and Charles L. Fridge, III.

Please find attached the following documents responsive to the subpoena:

- Purchase of stock # 868566 a Diamond, Cushion Solitaire Ring in Platinum on June 30, 2023 by Mr. Charles Fridge for \$151,550 inclusive of sales tax from the Harry Winston salon located in Houston, Texas. The following supporting documents are provided:
  - o Copy of computer generated sales invoice # H002459
  - o Copy of the manual sales invoice # HOU15283 signed by Mr. Fridge
  - o Copy of the payment received by wire transfer into the Harry Winston, Inc. bank account with HSBC as follows:
    - June 14, 2023 \$70,000
    - June 28 2023 \$81,550
- Direct Questions to be Propounded to the Witness

Sincerely,



Robert Scott  
Chief Financial Officer  
[rscott@harrywinston.com](mailto:rscott@harrywinston.com)  
212-315-7940

HO02459

NO. June 30, 2023



## HARRY WINSTON

718 FIFTH AVENUE  
NEW YORK, NEW YORK 10019  
(212) 245-2000  
www.harrywinston.com

C9293169  
Fridge, Charles  
6017 Memorial Dr.  
#705  
HOUSTON, TX 77007  
USA

868566	RGDPCU030MIC-060 - Diamond, Cushion, Solitaire Ring, 3.03 ctr stone, Micropave, Platinum	140,000.00
	4 DIA, ROUND, 1.00-1.04, DEF, VVS-VS 0.01700 Cts - 1 DIA CUSHION 3.00-3.49 E VS2 3.03000 Cts - 7426774260	
	14 DIA, ROUND, 1.30-1.34, DEF, VVS-VS 0.12600 Cts -	
	20 DIA, ROUND, 1.50-1.54, DEF, VVS-VS 0.27400 Cts -	
	33 DIA, ROUND, 1.60-1.64, DEF, VVS-VS 0.56400 Cts - PLAT 3.51000 Dwt	
		140,000.00
		11,550.00
	Sub Total	140,000.00
	HOUSTON-TX-Sales Tax: 8.25	11,550.00
	Bag Charge:	0.00
	Shipping + Insurance	0.00
		0.00
	Sale Total	151,550.00

NY25





## Statement details

Account name	Harry Winston Inc	Closing ledger balance brought forward	20,547,809.01
Account number	[REDACTED]	From 16 Jan 2024	
Bank name	HSBC Bank USA NA	Closing available balance brought forward	20,547,809.01
Currency	USD	From 16 Jan 2024	
Location	United States	Current ledger balance	28,701,876.31
BIC	[REDACTED]	As at 17 Jan 2024 12:58	
IBAN	Not Available	Current available balance	28,701,876.31
Account status	Active	As at 17 Jan 2024 12:58	
Account type	Current account	Specified date range	14 Jun 2023 to 15 Jun 2023

Bank reference	Customer reference	TRN status	Value date	Credit amount	Debit amount	Balance	Time	Post date
[REDACTED]	[REDACTED]	Posted	14 Jun 2023	70,000.00			17:56	14 Jun 2023
Narrative	INCOMING MONEY TRANSFER, 53RECD FED ZIONS BANCORPORATION, NA DBA AMEGY*ORG:CCS LAND DEVELOPMENT LLC,USA,HOUSTON TX 77007-7052,6017*BNF:HARRY WINSTON, INC.,,NEW YORK NY/US,718 5TH A*OBI:CHARLES FRIDGE ENGAGEME, NT DEPOSIT*STFEDSEQ:B1Q8982R003776*TIME:1756*YOUR REF:NONREF*OUR, REF:165616498							



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Account name	Harry Winston Inc	Closing ledger balance brought forward	20,547,809.01
Account number	[REDACTED]	From 16 Jan 2024	
Bank name	HSBC Bank USA NA	Closing available balance brought forward	20,547,809.01
Currency	USD	From 16 Jan 2024	
Location	United States	Current ledger balance	28,701,876.31
BIC	[REDACTED]	As at 17 Jan 2024 12:58	
IBAN	Not Available	Current available balance	28,701,876.31
Account status	Active	As at 17 Jan 2024 12:58	
Account type	Current account	Specified date range	28 Jun 2023 to 28 Jun 2023

Bank reference	Customer reference	TRN status	Value date	Credit amount	Debit amount	Balance	Time	Post date
[REDACTED]	Z [REDACTED]	Posted	28 Jun 2023	81,550.00			11:30	28 Jun 2023
Narrative	INCOMING MONEY TRANSFER, 53RECD FED ZIONS BANCORPORATION, NA DBA AMEGY*ORG:VERDE CO2 CCS L, LC,USA,HOUSTON TX 77006-3440,3000 SMITH *BNF:HARRY WINSTON, INC., NEW YORK NY/US,718 5TH A*OBI:CHARLES FRIDGE*STFEDSEQ, B1Q8981R002117*TIME:1130*YOUR REF:NONREF*OUR REF:179598973							